



TROY LAW <troylaw@troypllc.com>

RE: Trial: Lin v. JD Produce Maspeth, LLC, et al., 20-CV-2746

1 message

Richard Qu <rqu@hanglaw.com>

Wed, Nov 1, 2023 at 5:56 PM

To: Stephanie Yu <Stephanie_Yu@nyed.uscourts.gov>, "troylaw@troypllc.com" <troylaw@troypllc.com>
Cc: "eaglechen123456@gmail.com" <eaglechen123456@gmail.com>, Hang Jian <jhang@hanglaw.com>, "kristi.edny_gmail.com" <kristi.edny@gmail.com>, Sidney Li <sli@hanglaw.com>

Dear Stephanie,

Thank you for the kind instructions. I'll do my best to coordinate with counsel regarding the next steps.

Aaron,

I was in mediation earlier today. I'd propose a 30-day extension to submit the joint pretrial submissions since I do need some time to review the pretrial submissions. Will you please draft a joint request to adjourn the trial ?

For trial dates, will the weeks of January 22 or February 5 work for you?

Respectfully,

GE Qu, Esq.

(718)353-8588 (Tel) |(516) 669-0194 (Direct)|(718) 353 6288 (Fax)

rqu@hanglaw.com | www.hanglaw.com



HANG & ASSOCIATES, PLLC
杭剑联合律师事务所

136-20 38th Avenue, Suite 10G

Flushing, New York 11354

CONFIDENTIALITY NOTE: This e-mail is intended only for the person or entity to which it is addressed and may contain information that is privileged, confidential or otherwise protected from disclosure. Dissemination, distribution or copying of this e-mail or the information herein by anyone other than the intended recipient, or an employee or agent responsible for delivering the message to the intended recipient, is prohibited. If you have received this e-mail in error, please call Hang & Associates, PLLC at (718) 353-8588 and destroy the original message and all copies.

To ensure compliance with requirements imposed by the IRS, we inform you that any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

Pursuant to the CAN-SPAM Act this communication may be considered an advertisement or solicitation. If you would prefer not to receive future marketing and promotional mailings, please submit your request via email to contact@hanglaw.com.

From: Stephanie Yu <Stephanie_Yu@nyed.uscourts.gov>

Sent: Wednesday, November 1, 2023 5:46 PM

To: troylaw@troypllc.com

Cc: quge87@gmail.com; Richard Qu <rqu@hanglaw.com>; eaglechen123456@gmail.com; Hang Jian <jhang@hanglaw.com>; shan.zhulaw@gmail.com; kristi.edny_gmail.com <kristi.edny@gmail.com>

Subject: RE: Trial: Lin v. JD Produce Maspeth, LLC, et al., 20-CV-2746

Hi Aaron,

Thank you for giving me an update. If the parties are seeking an adjournment, please file a motion to adjourn on the docket as soon as possible and await the Court's decision on the motion. Ge – please reach out to Aaron/Plaintiff's counsel so the parties may further coordinate the appropriate next steps. Time is really of the essence here.

Prior to my leave, I had already put in an order for jurors to appear on Monday. If the parties are going to adjourn, you should seek the approval of the Court **as soon as possible** so court resources and mostly importantly the jurors' time are not wasted.

Best,

Stephanie



Stephanie Yu

Case Manager/Courtroom Deputy to the Honorable William F. Kuntz, II

U.S. District Court – Eastern District of New York

225 Cadman Plaza East

[Brooklyn, NY 11201](#)

(718) 613-2205

From: Troy Law <troylaw@troypllc.com>
Sent: Wednesday, November 1, 2023 5:18 PM
To: Stephanie Yu <Stephanie_Yu@nyed.uscourts.gov>
Cc: quge87@gmail.com; rqu@hanglaw.com; eaglechen123456@gmail.com; jhang@hanglaw.com; shan.zhulaw@gmail.com; kristi.edny@gmail.com <kristi.edny@gmail.com>
Subject: Re: Trial: Lin v. JD Produce Maspeth, LLC, et al., 20-CV-2746

CAUTION - EXTERNAL:

Dear Ms Yu,

Thank you for keeping a firm hand on this matter, and for reaching out to us.

I have been trying to reach Defense counsel all day to speak with him regarding this matter, but except for about 5 minutes around 3:00 PM I was unable to do so. His office informs me he left at about 4:30 PM. I have also attempted to reach him by cell phone, but it goes directly to voicemail.

The parties did not reach out to Magistrate Judge Merkl in the hopes that they could resolve the matter among themselves. Defense counsel and I are experienced dealing with each other and have settled a large number of cases between ourselves. Plaintiff made his latest settlement demand on October 30, 2023, and Defendants are still considering it, but have not counter-offered since then.

Neither party has motions in limine. I emailed a draft jury charge, verdict sheet, and voir dire to Defense counsel on October 31, 2023, and at the same time a copy of Plaintiff's marked exhibits. I had meant to email them earlier, but it turned out I had inadvertently sent the emails to my own email address and omitted to send them to Defense counsel's. I apologize for the error.

I believe an adjournment may be warranted in light of the above, and especially to give the parties more time to settle the case if possible.

Yours sincerely,
Aaron Schweitzer

TROY LAW pllc
Attorneys & Counselors at Law
English, Mandarin, Spanish, Korean, Hindi
admitted/practiced in the courts

CA CT DCD FL* IL IN MA MD MI MN MO

NH NJ NY OH PA SC RI TX VA WA WV

www.TroyPllc.Com

TEXT +1 (718) 762-1324 CALL

NY: 41-25 Kissena Blvd., Suite 110, [x103 x119], Flushing, NY 11355

CA : 2055 Junction Ave, Suite 205, San Jose, CA 95131

TPE: No. 372 Linsen N. Rd, Suite 1100, Taipei, Taiwan 10446

蔡鴻章 律師事務所

PLEASE EMAIL or TEXT

**Troy Law Accept Service by E-Mail for Clients subject to confirmation*

**Clients shall retain all their own originals or copies.*

Sender notified by

Mailtrack

On Wed, Nov 1, 2023 at 9:57 AM Stephanie Yu <Stephanie_Yu@nyed.uscourts.gov> wrote:

Counsel,

I hope you are doing well. I am back from my leave and I'm looking into the above reference case that is scheduled to proceed to trial in **3 business days**. During the final pretrial conference held on 10/13/23, the Court had urged the parties to reach out to the Honorable Taryn A. Merkl for settlement discussions. It was surprising to me to see that there has been no activity on the docket since the final pretrial conference held three weeks ago. As of this morning, it does not appear that the parties reached out to Judge Merkl and the required pretrial filings as dictated by Judge Kuntz's individual rules V.B (motions in limine, proposed voir dire questions, proposed jury instructions, proposed verdict sheet, etc.) have not filed.

It is unclear to me from reviewing the docket sheet, if the parties are still proceeding to trial or if the parties are planning to seek an adjournment.

Please advise as to the status of the case and the ETA on the filings that are required from the parties prior to trial.

I am copying Kristi Cruz, the court reporter assigned to our trial next week. She emailed the parties to inquire about the parties' transcript order for trial but has not received a response from either counsel. Please take a moment to review her email and respond **as soon as possible**.

Best,

Stephanie



Stephanie Yu

Case Manager/Courtroom Deputy to the Honorable William F. Kuntz, II

U.S. District Court – Eastern District of New York

225 Cadman Plaza East

[Brooklyn, NY 11201](#)

(718) 613-2205

CAUTION - EXTERNAL EMAIL: This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.